

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AMY WAX,

**Plaintiff,**

v.

THE TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA,

**Defendants.**

No. 2:25-cv-00269-TJS

**PROFESSOR AMY WAX’S MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Professor Amy Wax (“Plaintiff” or “Professor Wax”), by and through undersigned counsel, respectfully moves for an order under Federal Rule of Civil Procedure 65 for a preliminary injunction in her favor against the named Defendants. As explained in the Verified Complaint and further explicated in the attached Memorandum, Defendants’ ongoing actions continually harm Professor Wax’s reputation and continue to violate her civil rights under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq. (“Title VII”), Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. (“Title VI”) and Section 1981, 42 U.S.C. § 1981 (“Section 1981”).

For the foregoing reasons, as explicated in the accompanying Memorandum, Professor Wax respectfully requests a preliminary injunction, without bond, enjoining Defendants from implementing the final decision imposing sanctions against Professor Wax, specifically: (1) refrain from requiring Professor Wax to adhere to the Speech Policy or face further sanctions; (2) refrain from suspending Professor Wax for the 2025-2026 academic year; and (3) restore Professor Wax’s named chair.

Per the sanctions' requirements, Professor Wax requests resolution of this motion before August 2025, when the major sanction of suspension will be imposed against Professor Wax, although expeditious resolution is needed regardless due to the ongoing harms to her reputation and civil rights, and her ability to plan alternative employment.

Dated: March 14, 2025

Respectfully submitted,

/s/ Samantha K. Harris

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*Attorneys for Plaintiff Professor Amy Wax*

*\* pro hac vice*

**Certificate of Service**

I hereby certify that on this 14<sup>th</sup> day of March 2025, I electronically filed the a true and correct copy of the Plaintiff's Motion for Preliminary Injunction with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Samantha K. Harris  
Samantha K. Harris